

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	Criminal Nos.
	:	
	:	1:01-CR-193 (MD/PA)
	:	1:05-CR-006 (MD/PA)
v.	:	1:05-CR-203 (MD/PA)
	:	1:05-CR-228 (WD/AR)
JOHN MIZIC	:	1:05-CR-232 (MD/PA)
	:	1:05-CR-256 (WD/LA)
	:	1:05-CR-259 (D/WY)
	:	1:05-CR-284 (WD/VA)
	:	1:05-CR-294 (CD/IL)
	:	1:05-CR-252 (D/NE)
	:	1:05-CR-253 (ED/TX)
	:	1:05-CR-288 (MD/FL)
	:	1:05-CR-324 (ED/TN)
	:	1:05-CR-296 (SD/MS)
	:	1:05-CR-285 (MD/PA)
	:	1:05-CR-287 (MD/PA)
	:	1:05-CR-305 (MD/PA)
	:	1:05-CR-306 (MD/PA)
	:	1:05-CR-267 (D/MN)
	:	1:05-CR-440 (D/NH)
	:	1:05-CR-456 (SD/IA)
	:	
	:	Judge Sylvia H. Rambo
	:	(Electronically Filed)
	:	

MOTION FOR EXTENSION OF TIME
TO FILE PRESENTENCE REPORT OBJECTIONS

AND NOW comes the defendant, John Mizic, through his attorney, James V. Wade, Federal Public Defender and files this Motion for Extension of Time to File Presentence Report Objections and in support thereof, the following is averred:

1. The above cases encompass charges of escape, bank fraud, and possession of stolen mail in the Middle District of Pennsylvania as well as similar charges in other federal judicial districts that were transferred to the Middle District pursuant to Rule 20 of the Federal Rules of Criminal Procedure.
2. On January 27, 2005 and on January 5, 2006, Mizic pled guilty to all charges pursuant to a Rule 11 (c)(1)(C) plea agreement.
3. The Court initially deferred its decision as to the acceptance or rejection of the Rule 11 (c)(1)(C) plea agreement. The Court accepted the plea agreement on January 5, 2006.
4. On September 26, 2006, the Federal Public Defender's Office received the 41-page presentence report. Presentence Report objections are due on October 13, 2006.
5. Defendant has been incarcerated at the Low Security Correctional Institution at Allenwood.
6. The Low Security Correctional Institution at Allenwood is open for visitation Friday through Sunday from 8:00 a.m. to 3:00 p.m.
7. Counsel has met with Defendant to review the presentence report but needs more time due to institution's one weekday visitation policy and the lengthiness of the presentence report.

8. Counsel requests that he be allowed an extension of time to file presentence report objections to Monday, October 23, 2006.
9. First Assistant United States Attorney Carlson concurs with the granting of this request.

WHEREFORE, for all the foregoing reasons, the defendant, John Mizic respectfully requests that this Honorable Court grant his Motion for Extension of Time to File Presentence Report Objections.

Respectfully submitted,

Date: October 11, 2006

s/ James V. Wade
JAMES V. WADE, ESQUIRE
Federal Public Defender
Attorney ID #PA33352
100 Chestnut Street, Suite 306
Harrisburg, PA 17101
Tel. No. (717) 782-2237
Fax No. (717) 782-3881
(James_Wade@fd.org)
Attorney for John Mizic

CERTIFICATE OF SERVICE

I, James V. Wade, Federal Public Defender do hereby certify that on this date I served a copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE PRESENTENCE REPORT OBJECTIONS**, via Electronic Case Filing, or by placing a copy in the United States mail, first class in Harrisburg, Pennsylvania, addressed to the following:

Martin C. Carlson, Esquire

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

John Mizic

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Respectfully submitted,

Date: October 11, 2006

s/ James V. Wade

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Federal Public Defender
Attorney ID #PA33352
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Harrisburg, PA 17101
Tel. No. (717) 782-2237
Fax No. (717) 782-3881
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